

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**EDWARD CONSTANTINESCU,  
PERRY “PJ” MATLOCK,  
JOHN RYBARCZYK,  
GARY DEEL,  
STEFAN HRVATIN,  
TOM COOPERMAN  
MITCHELL HENNESSEY,  
DANIEL KNIGHT**

**Defendants.**

Case No. 22-CR-00612

**[Proposed] ORDER**

Under 18 U.S.C. § 3771, the United States of America seeks an order authorizing it to provide notice to the large number of crime victims in this case via a publicly accessible Department of Justice (“DOJ”) website. Under Section 3771(a)(2), crime victims have a right to “reasonable, accurate, and timely notice” of public court proceedings. In this case, the potential victims of the charged securities fraud scheme are numerous market participants that traded the various securities with which the Defendants executed their alleged scheme throughout the relevant period in the Indictment. These numerous individuals have not yet been fully identified and located. Thus, it will be impracticable for the United States to identify and locate all investors and provide them with reasonable, accurate, and timely notice by mail of this case and any future proceedings.

Under such circumstances, Section 3771(d)(2) of the Crime Victims' Rights Act gives the Court the authority to "fashion a reasonable procedure to give effect to this chapter that does not unduly complicate or prolong the proceedings." The United States seeks authorization to provide notice to the potential victim investors through a public DOJ website at <https://www.justice.gov/criminal-vns/case/united-states-v-constantinescu-et-al>, which would provide a summary of the case, information regarding the case's status, and other significant case-related documents. The website also would contain an e-mail address and telephone number for a Victim Assistance Line through which individual potential crime victims could contact the Department of Justice with questions regarding the case.

The Court finds: (1) that the "multiple victim" provisions of 18 U.S.C. § 3771(d)(2) apply to the above-captioned case; (2) that it is impracticable for the United States to identify and notify all of the direct and proximate victims of the charged offense on an individual basis at this time without unduly complicating or delaying the proceedings in this case; and (3) notice by public DOJ website is a "reasonable procedure" to give effect to the provisions of 18 U.S.C. § 3771. Accordingly, it is ordered that the United States is authorized to comply with 18 U.S.C. § 3771(a)(2) by providing notice to potential victims through a publicly accessible DOJ website, <https://www.justice.gov/criminal-vns/case/united-states-v-constantinescu-et-al>.

Signed at Houston, Texas this the \_\_\_\_ day of \_\_\_\_\_, 2023.

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THE HONORABLE ANDREW HANEN  
UNITED STATES DISTRICT JUDGE